

1 NICHOLAS MARCHI  
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4 Attorneys for Defendant

5  
6 UNITED STATES DISTRICT COURT  
IN AND FOR THE EASTERN DISTRICT OF WASHINGTON

7 UNITED STATES OF AMERICA,

8 Plaintiff,

9 vs.

10 LETICIA RODRIGUEZ,

11 Defendant.

Case No. 4:21-cr-6028-MKD-7

12 UNOPPOSED MOTION TO CONTINUE  
TRIAL DATE AND RESETTING DATES  
FOR FILING MOTIONS AND PRE-TRIAL  
CONFERENCE AND ATTACHED  
DECLARATION

13 Note: May 5, 2022  
14 Judge Dimke at Richland, WA.

15  
16 COMES now the defendant by and through her attorneys and requests this Court grant  
the defendant's request for a continuance of her pretrial conference and trial date. The defendant  
17 is currently scheduled for trial on May 23, 2022. The defendant would request that the trial be  
18 continued to July 15, 2022. The government does not oppose this request. This motion is based  
19 on the attached Declaration of Nicholas Marchi.

20  
21 Dated this 5<sup>th</sup> day of April 2022.

22  
23 Respectfully submitted,

24  
25 *s/Nicholas Marchi*  
Nicholas Marchi, WSBA 19982  
CARNEY & MARCHI  
Attorneys for Defendant

1 DECLARATION

2 I, NICHOLAS MARCHI, first being duly sworn upon oath deposes and says:

3 1. I represent the defendant in the above cause of action. This action is currently  
4 scheduled for trial on May 23, 2022. I make this Declaration in support of the defendant's  
5 Motion to Continue the Trial date and Pre-Trial Conference.

6 2. On March 28, 2022, I received the discovery in this matter. As I just received the  
7 discovery, additional time is required to review the information and review it with the defendant.

8 3. I spoke with AUSA S. Van Marter, and she does not oppose the request. Ms.  
9 Rodriguez does not oppose this request and will file a Statement of Reasons in support of this  
10 request.

11 4. I declare under penalty of perjury that the foregoing is true and correct.

12 Dated this 5<sup>th</sup> day of April 2022, at Seattle WA.

13 s/ *Nicholas Marchi*

14 NICHOLAS MARCHI

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2  
3 **CERTIFICATE OF SERVICE**

4 I certify that a copy of the Defendant's Motion to Continue Sentencing was e-mailed via  
5 ECF on 4/5/2022, to S. Van Marter, Assistant United States Attorney, 402 E. Yakima Ave., Suite  
6 210, Yakima, WA 98901.

7 *S/Nicholas Marchi*  
8 CARNEY & MARCHI, P.S.  
9 Attorneys for Defendant